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R E M A R K S

Claims 2, 3 and 16 have been cancelled. Claims 1, 4-15 and 17-20 stand as previously presented.

Claims 1-20 were considered in the Office Action.

5        Claims 2, 3 and 16 stand rejected under 35 U.S.C. 112, 1<sup>st</sup> paragraph, as failing to comply with the enablement requirement. Claims 1-3, 5 and 10-20 stand rejected under 35 U.S.C. 102(b) as being anticipated by McNeil et al., U.S. Patent 6,167,052 (hereinafter McNeil). Applicants  
10        respectfully note that if these claims are to be rejected under 35 U.S.C. 102, this should be 35 U.S.C. 102(e) rather than 102(b). Claims 4-9 stand rejected under 35 U.S.C. 103(a) as being unpatentable over McNeil in view of Specht, U.S. Patent 6,414,958 B1.

15        Support for the amendment to the specification is found at least in originally filed claims 2, 3 and 16. No new matter has been added.

20        Applicants believe that the subject matter of claims 2, 3 and 16 is fully enabling in the specification for one skilled in the art. Applicants believe that originally filed claims 2, 3 and 16 were sufficiently described at least in Applicants' specification at page 2, line 29 - page 3, line 5, page 4, lines 9-14, page 10, lines 6-11, and page 12, line 9 - page 13, line 25. However, because these are only dependent  
25        claims, Applicants have cancelled claims 2, 3 and 16 in order to advance prosecution.

The Invention of claim 1

The cited references do not disclose or suggest:

"A method of providing a plurality of secure computer

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environments in a shared computer system, comprising:

**providing said shared computer system, said shared computer system comprising:**

**a plurality of computers;**

5 **at least one virtual local area network switch connected to said plurality of computers;**

**a plurality of client connection ports connected to said virtual local area network switch;**

10 **a configuration engine electrically connected to said at least one virtual local area network switch, said configuration engine comprising computer readable program code for configuring said at least one virtual local area network switch; and**

15 **said configuration engine configuring said at least one virtual local area network switch to connect each of said plurality of client connection ports to at least one of said plurality of computers while isolating said plurality of client connection ports from one another so that each of said client connection ports may be connected to at least one of said plurality of secure computer environments on said plurality of computers."**

(Claim 1, emphasis added)

25 The above highlighted features which differentiate embodiments of the present invention from the cited references are features that are not anticipated by the cited references and would not have been obvious to a person with ordinary skill in the art having the cited references. McNeill does not disclose a shared computer system, such as the computer system in an application service provider, in which the multiple clients sharing resources in the computer system are completely isolated from each other.

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McNeill also does not disclose a plurality of client connection ports connected to at least one VLAN switch. McNeill discloses a static network configuration having multiple domains using VLANS in a conventional configuration.

5 McNeill does not disclose that external clients may be connected to the network through client connection ports to share network resources while being isolated from each another.

McNeill also does not disclose a configuration engine connected to a VLAN switch. McNeill does not disclose that switch 128.1 is a VLAN switch, and therefore does not disclose performing the same function and providing the same configurable security as the VLAN switch configured by the configuration engine as in Applicants' claim 1. To anticipate

10 a claim for a patent, a single prior source must contain all its essential elements. Hybritech, Inc. v. Monoclonal Antibodies, Inc., 231 USPQ 81, 90 (Fed. Cir. 1986).

The Applicants believe the claim 1 is allowable over the cited references and respectfully request reconsideration.

20 Claim 2 is believed allowable as depending from an allowable base claim and is further believed allowable in that the cited references to not disclose or suggest:

"The method of claim ?, further comprising said configuration engine reading computer requirements from at least one client connected to at least one of said plurality of client connection ports."

(Claim 2, emphasis added)

The cited references do not disclose a configuration engine reading computer requirements from a client. The Examiner has indicated that client connections to network resources are restricted and provided based on some criteria.

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However, as noted above, McNeill discloses a typical static network configuration. Access is controlled by static access control lists defining connectivity restrictions by IP addresses. (See McNeill col. 1, lines 1-5) This does not  
5 disclose or suggest the shared computer system in which client connections are dynamically configured based on clients computer requirements by a configuration engine. Applicants therefore believe that claim 2 is allowable over the cited references and respectfully request reconsideration.

10 Claim 3 is believed allowable as depending from an allowable base claim and is further believed allowable in that the cited references do not disclose or suggest:

"The method of claim 2, further comprising said  
configuration engine calculating an optimum allocation of said  
15 plurality of computers to meet said computer requirements of said at least one client."

(Claim 3, emphasis added)

The cited references do not disclose a configuration engine calculating an optimum allocation of computers in a  
20 shared computer environment to meet client requirements. As noted by the Examiner, this may comprise using load balancing or brokering systems, and is based on client requirements. However, Applicants disagree that McNeill discloses any calculation of optimum allocation of computers for clients.  
25 McNeill does disclose network connectivity restrictions using access control lists. However, there is no disclosure or suggestion that computers are allocated optimally for clients based on client requirements.

Dependent claims 4-10 depend ultimately upon independent  
30 claim 1 which is allowable over the cited art as discussed above. These dependent claims are likewise in condition for

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allowance at least because they depends on an allowable independent claim. However, dependent claims 4-10 are independently allowable at least in that they recite particular features which, when combined with the elements of the independent claim, are not disclosed or suggested in the cited references.

Claim 11 is believed allowable as depending from an allowable base claim and is further believed allowable in that the cited references to not disclose or suggest:

"The method of claim ?, said shared computer system further comprising computer readable program code for authenticating client identification, said method further comprising **authenticating client identification before said configuration engine configures said at least one virtual private network router.**"

(Claim 11, emphasis added)

The cited references do not authenticate client identification **before** configuring a VPN router. Rather, the conventional network configurations disclosed by the cited references are statically configured, and network access is controlled during use by access control lists established in advance. In contrast, in Applicants' invention of claim 11, the configuration engine dynamically configures the network based on client requirements after authenticating client identification. In other words, the cited references statically configure a network, then control network access based on access control lists. In the invention of claim 11, clients are authenticated, then the network is dynamically configured by the configuration engine based on client requirements.

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The Invention of claim 13

The cited references do not disclose or suggest:

"A secure computer system, comprising:

a plurality of computers;

5 a plurality of client connection ports;

at least one virtual local area network switch  
electrically connected to said plurality of computers and  
to said plurality of client connection ports, wherein  
said at least one virtual local area network switch is  
10 configurable to changeably connect each of said plurality  
of client connection ports to at least one of said  
plurality of computers while isolating said plurality of  
client connection ports from one another; and

a configuration engine electrically connected to  
15 said at least one virtual local area network switch, said  
configuration engine comprising computer readable program  
code for configuring said at least one virtual local area  
network switch to changeably connect each of said  
plurality of client connection ports to at least one of  
20 said plurality of computers while isolating said  
plurality of client connection ports from one another."

(Claim 13, emphasis added)

Applicants repeat the arguments for allowability set  
forth above with respect to claim 1, but specifically directed  
25 to the secure computer system of claim 13. Again, the cited  
references do not disclose a secure computer system having a  
plurality of client connection ports and a configuration  
engine that connects clients to computers in the secure  
computer system while isolating the clients from each other.

30 Dependent claims 14-15 depend ultimately upon independent

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claim 13 which is allowable over the cited art as discussed above. These dependent claims are likewise in condition for allowance at least because they depends on an allowable independent claim. However, dependent claims 14-15 are  
5 independently allowable at least in that they recite particular features which, when combined with the elements of the independent claim, are not disclosed or suggested in the cited references.

10 Claim 16 is believed allowable as depending from an allowable base claim and is further believed allowable in that the cited references to not disclose or suggest:

"The secure computer system of claim ?, wherein said  
computer readable program code in said configuration engine  
further comprises code for reading client computer  
15 requirements from at least one client connected to said client connection ports."

(Claim 16, emphasis added)

Applicants repeat the arguments for allowability set forth above with respect to claim 2, but specifically directed  
20 to the secure computer system of claim 16. Again, the cited references do not disclose a configuration engine that reads client computer requirements.

Dependent claims 17-19 depend ultimately upon independent claim 13 which is allowable over the cited art as discussed  
25 above. These dependent claims are likewise in condition for allowance at least because they depends on an allowable independent claim. However, dependent claims 17-19 are independently allowable at least in that they recite particular features which, when combined with the elements of  
30 the independent claim, are not disclosed or suggested in the cited references.

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The Invention of claim 20

The cited references do not disclose or suggest:

"A secure computer system, comprising:

a plurality of computers;

a plurality of client data inputs; and

means for securely connecting a portion of said plurality of client data inputs to a portion of said plurality of computers while isolating said portion of said plurality of computers from a second portion of said plurality of computers."

(Claim 20, emphasis added)

Applicants repeat the arguments for allowability set forth above with respect to claim 1, but specifically directed to the secure computer system of claim 20. Again, the cited references do not disclose a plurality of client data inputs. The cited references also do not disclose securely connecting client data inputs to computers in the secure computer system while isolating the client data inputs. The networks disclosed in the cited references are directed at controlling access using access control lists, and no discussion is directed at isolating clients accessing resources in the network from each other.



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The Applicants believe that the currently pending claims are allowable over the cited references and respectfully request the timely issuance of a Notice of Allowance.

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